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**UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA, WESTERN DIVISION**

**CATALINA YACHTS, INC., a
California Corporation.**

Plaintiff,

V.

SHARON DAY, an individual;
GERARD DOUGLAS, an individual;
and DOES 1 through 10, inclusive,

Defendants

GERARD DOUGLAS,

Plaintiff

V.

Defendant

and

SHARON DAY.

Counterclaim Plaintiff,

v.

CATALINA YACHTS, INC., a California Corporation,

Case No. 2:25-CV-04090-SVW-RAO

Assigned to The Hon. Stephen V.
Wilson

**DECLARATION OF STEVEN M.
BERMAN IN SUPPORT OF
MOTION FOR PARTIAL
SUMMARY JUDGMENT**

[Filed concurrently with Notice of Motion and Memorandum of Points and Authorities; Statement of Uncontroverted Facts; and [Proposed] Order]

Date: January 26, 2026

Time: 1:30 p.m.

Courtroom 10A

Action Filed: May 7, 2025
Trial Date: February 17, 2026

1 Counterclaim Defendant.
2
3
4

5 **DECLARATION OF STEVEN M. BERMAN**
6

7 I, Steven M. Berman, declare as follows:
8

9 1. I am an attorney duly admitted to practice before this Court and counsel
10 of record for Defendant/Counter-Plaintiff Sharon Day (“Ms. Day”). I have personal
11 knowledge of the facts set forth herein and if called as a witness, I could and would
12 competently testify to the matters stated herein. I make this declaration in support of
13 Ms. Day’s Motion for Partial Summary Judgment.
14

15 2. On May 7, 2025, Catalina Yachts, Inc. (“Catalina”) filed its Complaint
16 against Ms. Day and Gerald Douglas. Doc. 1. Exhibit 1 to Catalina’s Complaint is
17 the Bonus Compensation Agreement dated November 18, 2002. *See* Doc. 1-1.
18

19 3. On July 28, 2025, Ms. Day filed the Answer and Counterclaims of
20 Defendant Sharon Day. *See* Doc. 46. On October 28, 2025, Ms. Day filed the
21 Amended Answer and Counterclaims of Sharon Day. *See* Doc. 77.
22

23 4. Attached hereto as **Exhibit 1** is a true and correct copy of excerpts from
24 the deposition transcript of the corporate representative of Catalina, taken on
25 December 10, 2025.
26

27 5. Attached hereto as **Exhibit 2** is a true and correct copy of the warranty
28 deed reflecting the First Sale to Generation Church of Tampa Bay, Inc.
29

30 6. Attached hereto as **Exhibit 3** is a true and correct copy of the warranty
31 deed reflecting the Second Sale to Prometheus Maritime Properties.
32

33 7. Attached hereto as **Exhibit 4** is a true and correct copy of the Asset
34 Purchase Agreement with Michael Reardon.
35
36

8. Attached hereto as **Exhibit 5** is a true and correct copy of the Affidavit of Michael Reardon.

9. Attached hereto as **Exhibit 6** is a true and correct copy of an excerpt from the deposition transcript of Keith Lichtman, taken on December 8, 2025.

10. Attached hereto as **Exhibit 7** is a true and correct copy of the Bonus Compensation Agreement dated November 18, 2002.

11. On December 5, 2025, I met and conferred via video conference with Catalina's counsel and Gerard Douglas' counsel regarding our planned motion for summary judgment.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Executed on this 22nd day of December 2025 in Houston, Texas.



Steven M. Berman